

Estimated Hearing Date: To be announced by Court

Objection Deadline: To be announced by Court

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**PLAINTIFF BLANCA IRIS MARRERO'S FURTHER
CONSENTED MOTION FOR EXTENSION OF TIME TO FILE REPLY OR
OTHERWISE INFORM AGREEMENT WITH DEBTORS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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TO THE HONORABLE LAURA TAYLOR SWAIN,
UNITED STATES DISTRICT JUDGE:

COMES Now, State Court Plaintiff Blanca Iris Marrero (“claimant”), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. On June 12, 2022 at ECF No. 21192 the appearing claimant filed her application for payment of administrative expenses on account of a civil tort claim filed at the Puerto Rico Court of First Instance, San Juan Superior Part.
2. On August 26, 2022 at ECF 21931 the Debtors Commonwealth of Puerto Rico (“Commonwealth”) and Public Buildings Authority (“PBA”) filed their objection to claimant’s application.
3. As informed in our previous motions requesting an extension of time to file our reply, counsel for claimant and counsel Steve Ma on behalf of the Debtors held a telephone conference to explore the possibility of reaching a mutually agreeable solution to this issue. To that effect, certain courses of action discussed by the parties’ counsel are being considered by counsel for the Commonwealth and PBA. Also, information from the Debtors’ insurance companies is being requested and analyzed by their counsel. Additionally, the feasibility of addressing this claim through the confirmed plan of adjustment claims resolution process is being contemplated. All of this is taking place at present.
4. In light of the above stated, counsel for the Commonwealth and PBA amiably agreed to grant claimant herein a further extension of time, until October 25, 2022 to file any reply, if needed, to the opposition to claimant’s administrative claim. The Court’s November 2, 2022 hearing date will not be affected by the instant request.

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NOTICE

Notice of this Motion has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtor's Claims and Noticing Agent, by e-mail or by first-class mail.

No prior request for the relief sought herein has been made to this Court or to any other court.

WHEREFORE, the appearing Claimant respectfully requests that this Court allow movant herein to file her reply to ECF 21931, if needed, by October 25, 2022, and that the hearing on the issue remain set for the November 2, 2022 scheduled date, with any other appropriate relief.

RESPECTFULLY SUBMITTED.

Dated: October 11, 2022

Respectfully submitted,

s/ Fernando Van Derdys, Esq.

USDC-PR 201913

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